

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

NANCY ALBRIGHT and SARAH)	
RODHOUSE, individually and as the)	
representatives of a class of similarly situated)	
persons,)	
)	Case No. 4:11-CV-01691AGF
Plaintiffs,)	
)	
v.)	
)	
THE BI-STATE DEVELOPMENT AGENCY)	
OF THE MISSOURI-ILLINOIS)	
METROPOLITAN DISTRICT d/b/a METRO,)	
)	
Defendant.)	

JOINT STATUS REPORT REGARDING SETTLEMENT

Plaintiffs and Defendant, by and through their respective counsel, submit the following Joint Status Report:

1. On May 8, 2012, the Court entered an Order staying this litigation for 45 days so that the Parties could finalize the details of the class-action settlement terms. Docket No. 35.
2. On Friday, July 6, 2012, the Parties and the Court held a telephone conference regarding progress of settlement and valuation for the purposes of preparing for mediation.
3. On July 11, 2012, the Parties held an additional ADR conference.
4. On September 11, 2012, the Court entered an order denying Defendant's motion to dismiss without prejudice, continuing the stay, and requiring the Parties to file a status report with Court on or before October 15, 2012.
5. At the present time, the Parties have agreed upon the substantive terms of a settlement (except for attorney's fees and costs). The parties have also incorporated the substantive terms (except for attorney's fees and costs) in a long-form settlement agreement. The

parties have also agreed upon and drafted the claim and notice forms that accompany the long-form agreement.

6. The Parties have not reached an agreement regarding the issue of attorneys' fees and costs to Plaintiffs' counsel as part of the settlement.

7. Plaintiffs have tendered a demand regarding attorney's fees and costs to Defendant, and Defendant has made a counter-offer regarding Plaintiffs' attorney's fees and costs.

8. Plaintiffs request that a settlement conference be scheduled with the Court at the Court's earliest possible convenience in order to address any outstanding issues relating to settlement including attorneys' fees and costs. Defendant has no objection to the scheduling of a settlement conference.

DATED: October 15, 2012

s/Richard J. Doherty
One of Plaintiffs' Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to the following:

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s/Richard J.Doherty_____